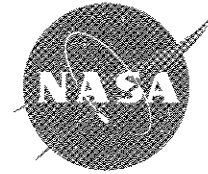


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



January 27, 2012

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Officials With Senior Institutional and Program Responsibilities to Attend Boeing 787 Dreamliner VIP Tour and Reception

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Several NASA officials, who have senior institutional and program responsibilities, have been invited to attend a reception sponsored by Boeing at the International Intermodal Center Air Cargo Facility in Huntsville, Alabama, on January 30, 2012, at 10:00 a.m.¹ This event will include a reception and tour of the Boeing 787 Dreamliner.

This event will be a widely-attended gathering of aerospace and aviation industry representatives; Boeing employees and suppliers; Boeing government customers, including NASA employees; media; community representatives, state and local elected officials, and members of the public. The food at the reception is valued at \$10 per person. There will be mementoes available for attendees to take with them which have a value of less than \$10. Approximately 250 individuals have been invited to attend. The event is fully funded by Boeing. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Boeing has several NASA contracts and is a potential source for future Space Launch System (SLS) work. The senior Marshall officials listed presently, or may in the near future, have extensive involvement in matters relating to Boeing's business interests. These personnel are similarly situated in that they each have senior institutional or program responsibilities for NASA that may involve Boeing.

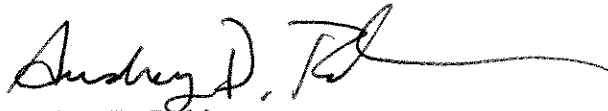
¹ Center Director (Robert Lightfoot); Deputy Director (Gene Goldman), Manager, Space Launch System (SLS) Program Office (Todd May); Deputy Manager, SLS (Jody Singer); Manager, SLS Stages Office (Anthony Lavoie); Chief Engineer, Core Stages SLS (Neil Otte); Associate Director for Technical Management (Garry Lyles); AST, Technical Resources Management (John Rector); Supervising AST Engineering Project Management (John Honeycutt); and AST Engineering Project Management (John Kress).

I have determined that free attendance of these individuals at the reception and tour is in the interest of the agency because it will further agency programs and operations. Their attendance at this event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs. Attendees can take mementoes which are valued at less than \$10 under the exception to the gift rule. *See* 5 C.F.R. § 2635.204(a).

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the nominal market value of the event, I have determined that the value to the agency in having these officials attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Accordingly, the listed employees may accept free attendance at the event.

Additionally, Boeing is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$10 cost of the reception, and may not take any mementoes.

Questions about this determination may be addressed to Pamela A. Bourque at 256-544-0024.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson
Chief Counsel